

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

IN RE:

KELLY T. FELDER
DEVON L. FELDER SR

CASE NO. 18-55647

CHAPTER 13

DEBTOR

JUDGE CHARLES M. CALDWELL

OBJECTION TO CONFIRMATION

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

Comes now Faye D. English, Chapter 13 Trustee and objects to confirmation of the plan and would show this Court that in the above-referenced case the Court should enter an order denying confirmation for the reasons set forth below and dismissing the case pursuant to 11 USC §1307(c) for the following:

- X The Chapter 13 Statement of Financial Affairs, Plan, Means Test, or Schedules must be amended to reflect the changes in the following areas: The income disclosed on Schedule I for Joint Debtor is not supported by the provided pay advices. Schedule J does not budget for Debtors' Homeowners Association dues. Plan does not provide an adequate protection payment for Nissan Motor Acceptance. Plan does not provide treatment for Fox Glen Association per the secured proof of claim filed. Plan provides for the first mortgage to be paid direct, however the proof of claim was filed with arrears. Form 2016-1(b) and Section 5.1.7 of the Plan do not match.
- X The Chapter 13 Plan must be amended to pay to the required applicable commitment period of U.S.C. § 1325 (b)(4). Plan is projecting 54 months.
- X Formal appraisal needed per treatment provided in Section 5.4.1 of the Plan. Clarification needed regarding Debtor's settlement/severance package through her former employer.

Wherefore, the Trustee prays the Court deny confirmation for the reasons set forth and the case be dismissed or converted to Chapter 7, whichever shall be determined in the creditor's best interest.

Dated: 11/2/2018

Respectfully submitted,

/s/ Faye D. English

Faye D. English
Chapter 13 Trustee
One Columbus
10 West Broad St., Suite 900
Columbus, OH 43215-3449
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Objection To Confirmation was served (i) **electronically** on the date of filing through the court's ECF System on all ECF participants registered in this case at the email address registered with the court and (ii) by **ordinary U.S. Mail** on 11/2/2018 addressed to:

Kelly T. Felder
Devon L. Felder Sr
165 Fox Glen Drive East
Pickerington, Oh 43147

/s/ Faye D. English

Faye D. English (0075557), Chapter 13 Trustee